

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*  
*Track Three Cases*

MDL 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**Plaintiffs Lake County's and Trumbull County's Witness List and Exhibit List**

Plaintiffs Lake County and Trumbull County submit this witness and exhibit list in conformity with the Court's Trial Order (Do. 4322).

**List of Witnesses**

- Dr. Katherine Keyes: As the court is aware from her phase 1 trial testimony, Dr. Keyes is a pre-eminent epidemiologist who has devoted most of her career to studying and evaluating the opioid epidemic in our country. She will testify about the harms that the two counties have suffered as a result of the defendants' substantial contribution to the oversupply of opioid pills. She will also quantify the number of OUD patients who will likely need treatment in the two counties and other aspects of the harms suffered.
- Dr. Caleb Alexander: The court is also aware of Dr. Alexander from his phase 1 trial testimony. Dr. Alexander is a pharmaco-epidemiologist who has studied and published extensively on what programs, infrastructure, and policies are required to abate the opioid epidemic. Dr. Alexander will present in his testimony the

abatement plan that he has tailored for the two counties to remedy the opioid related harms in the two counties.

- Dr. Nancy Young: Dr. Young is the executive director of the Children and Family Futures, a research and policy institute whose mission is to improve safety and well-being and recovery outcomes for children, parents and families affected by trauma, substance abuse, and mental health disorders. She has spearheaded the country's efforts to develop programs to assist families with substance abuse disorders and children with neonatal abstinence syndrome. She has done extensive work in Ohio to create plans for county agencies in that regard. Dr. Young will testify about the harms to the communities caused by the opioid epidemic and some of the county programs necessary to remedy those harms. She provides estimates of the number of children affected by parental substance use disorder, the number of women who use prescription opioids in the counties, and the number of children with opioid exposure and neonatal abstinence syndrome born each year in the counties.
- Dr. John Burke: Dr. John Burke is a noted local economist who has devoted his career, in part, to calculating the economic value or cost of remedying past and future harms suffered by individuals, companies, and public entities. Dr. Burke will testify about the costs associated with Dr. Alexander's abatement plan.
- Kim Fraser: Ms. Fraser is the executive director of the Lake County ADAMHS board. ADAMHS is an acronym that stands for alcohol, drug addiction, and mental health services. Ms. Fraser testified in phase 1 of the trial. Ms. Fraser will testify in phase 2 about the current programs that Lake County has to deal with the opioid

epidemic and how those programs are inadequate to meet the needs of true abatement. She will testify how Dr. Alexander's plan fills the gaps in the needed abatement programs in the county.

- April Caraway: Ms. Caraway is the executive director of the Trumbull County Mental Health and Recovery Board. Ms. Caraway testified in phase 1 of the trial. Ms. Caraway will testify in phase 2 about the current programs that Trumbull County has to deal with the opioid epidemic and how those programs are inadequate to meet the needs of true abatement. She will testify how Dr. Alexander's plan fills the gaps in the needed abatement programs in the county.

Plaintiffs will disclose by April 29<sup>th</sup> rebuttal expert reports.

#### List of Exhibits

<b>Ex. No</b>	<b>Date</b>	<b>Description</b>
P-23100	4/16/2021	Abatement Plan for Addressing the Opioid Crisis in Lake County and Trumbull County, Expert Witness Report of G. Caleb Alexander, MD, MS
P-23101	4/16/2021	Expert Witness Report of G. Caleb Alexander, MD, MS, Appendix A - Johns Hopkins Report: "From Evidence to Impact"
P-23102	4/16/2021	Expert Witness Report of G. Caleb Alexander, MD, MS, Appendix B - Curriculum Vitae
P-23104	4/16/2021	Expert Witness Report of G. Caleb Alexander, MD, MS, Appendix D - Materials Relied Upon
P-23105	4/16/2021	Expert Witness Report of G. Caleb Alexander, MD, MS, Appendix E - Lake County Redress Model and Trumbull County Redress Model
P-23106	4/16/2021	Expert Witness Report of G. Caleb Alexander, MD, MS, Appendix F - Potential Indictors of High-Risk Opioid Distribution
P-23116	4/16/2021	Expert Report of Katherine Keyes, PhD
P-23117	4/16/2021	Expert Report of Katherine Keyes, PhD, Exhibit A - Curriculum Vitae; Exhibit B - Materials Considered; Exhibit C - Compensation

P-23118	5/25/2021	Katherine Keyes, PhD production
P-23119	6/2/2021	Supplemental Material Considered List for Katherine Keyes, PhD
P-23127	4/16/2021	Expert Report of John F. Burke, PhD and Harvey S. Rosen, PhD of Burke Rosen & Associates
P-23128	4/16/2021	Expert Witness Report of Nancy K. Young, PhD, MSW
P-23129	4/16/2021	Expert Witness Report of Nancy K. Young, PhD, MSW, Appendix I. Curriculum Vitae; Appendix II. Lake and Trumbull County Initiatives Focused on Improving Outcomes for Families Affected by Substance Use Disorders; Appendix III. Interventions for Families, Infants, Children, and Adolescents Affected by Opioid Use Disorders; Materials Considered

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

*/s/Peter H. Weinberger*

Peter H. Weinberger